IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

STATE FARM FIRE AND CASUALTY COMPANY and STATE FARM LLOYDS,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	**CIVIL ACTION NO. 4:10-cv-657**
	§	
INSUBUY, INC. and NARENDRA KHATRI,	§	
	§	**JURY REQUESTED**
Defendants.	§	

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING

TO THE HONORABLE JUDGE OF SAID COURT:

Defendants Insubuy, Inc. and Narendra Khatri file this Unopposed Motion for Extension of Time to File their Responsive Pleading, and would respectfully show the Court as follows:

1. State Farm Fire and Casualty Company and State Farm Lloyds filed their Complaint for Declaratory Judgment against Insubuy, Inc. and Narendra Khatri on November 30, 2010. Summonses were issued for defendants on December 22, 2010 through an E-Gov Seal Summons but no return service has been processed yet.

2. Counsel for the parties have conferred and agreed, by letter dated January 13, 2011, that Insubuy, Inc. and Narendra Khatri shall have an extension of time until February 11, 2010, to file their responsive pleading to the Complaint.

3. Accordingly, Insubuy, Inc. and Narendra Khatri request that the Court enter the attached proposed order granting them until February 11, 2011, in which to file a responsive pleading to the Complaint for Declaratory Judgment.

4. This request and agreements by the parties are made without waiver of their respective rights.

5. Insubuy, Inc. and Narendra Khatri respectfully request that this Court grant any further relief to which they show themselves entitled.

RESPECTFULLY SUBMITTED,
DEDMAN & HANDSCHUCH, PLLC

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CERTIFICATE OF CONFERENCE

The parties hereby certify that they have discussed the contents of this Unopposed Motion, and the requests and agreements herein, and indicate that they agree or are otherwise not opposed to the relief requested herein.

s/Linda M. Dedman	s/ Julia Dobbins
Linda M. Dedman	Julia Dobbins
COUNSEL FOR DEFENDANTS	**COUNSEL FOR PLAINTIFFS**